

1 G. MARK ALBRIGHT, ESQ. (NV Bar # 1394)
2 DANIEL R. ORMSBY, ESQ. (NV Bar # 14595)
3 ALBRIGHT, STODDARD, WARNICK
4 & ALBRIGHT
5 801 S Rancho Dr., Ste D4
6 Las Vegas, NV 89106
7 Tel: (702) 384-7111
8 Fax: (702) 384-0605

9 *Liaison Counsel for Plaintiff*

10 ***ADDITIONAL COUNSEL ON SIGNATURE PAGE***

11
12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 ROY STRASSMAN, Derivatively on Behalf of
15 MARATHON DIGITAL HOLDINGS, INC.
16 (f/k/a MARATHON PATENT GROUP, INC.),
17 Plaintiff,

18 v.

19 FRED THEIL, GEORGES ANTOUN, KEVIN
20 DENUCCIO, SARITA JAMES, JAY LEUPP,
21 SAID OUISSAL, MERRICK D. OKAMOTO,
22 AND SIMEON SALZMAN,

23 Defendants,

24 -and-

25 MARATHON DIGITAL HOLDINGS, INC.
26 (f/k/a MARATHON PATENT GROUP, INC.),

27 Nominal Defendant.
28

Case No.: 2:22-cv-00724

DECLARATION OF MARK C. RIFKIN
IN SUPPORT OF MOTIONS
FOR (1) CONSOLIDATION AND
APPOINTMENT OF INTERIM CO-LEAD
COUNSEL AND (2) TO TEMPORARILY
STAY ALL MOTION TO DISMISS
BRIEFING AND MEMORANDUM IN
SUPPORT

1 I Marc C. Rifkin declare the following:

2 1. I am a resident of the State of New York and a partner at the law firm Wolf
3 Haldenstein Adler Freeman & Herz LLP.

4 2. I submit this declaration in support of the Motions for (1) Consolidation and
5 Appointment of Interim Co-Lead Counsel and (2) to Temporarily Stay All Motion to Dismiss
6 Briefing.

7 3. True and correct copies of the following documents cited in the accompanying Motion
8 are attached as Exhibits 1 and 2:

9 EXHIBIT DESCRIPTION

10 1. Firm Resume of Wolf Haldenstein Adler Freeman & Herz LLP.

11 2. Firm Resume of Gainey McKenna & Egleston.

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct based upon my knowledge, information and belief.

14 Dated: May 23, 2022

15 /s/ Mark C. Rifkin
16 Mark C. Rifkin